

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*Kah'Lil Kiree Lamonte Wade, An Adult Male,  
Date Of Birth January 21, 1997 for the Purpose of  
Deoxyribonucleic Acid (DNA) Testing

Case No. 2:22-mj-807

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

SEE ATTACHMENT A

located in the Southern District of Ohio ~~XXXX~~, there is now concealed *(identify the person or describe the property to be seized)*:

SEE ATTACHMENT B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*  
18 U.S.C. § 922(g)(1)*Offense Description*  
Unlawful possession of a firearm or ammunition by a prohibited person.

The application is based on these facts:

SEE AFFIDAVIT ATTACHED HERETO AND INCORPORATED BY REFERENCE HEREIN

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

Justin Myers, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/22/2022City and state: Columbus, Ohio  
Kimberly A. Johnson

United States Magistrate Judge



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN THE MATTER OF THE SEARCH AND  
SEIZURE OF:**

**KAH'LIL KIREE LAMONTE WADE, AN  
ADULT MALE, DATE OF BIRTH  
JANUARY 21, 1997 FOR THE PURPOSE  
OF DEOXYRIBONUCLEIC ACID (DNA)  
TESTING**

**Case No.** 2:22-mj-807

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER  
RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Homeland Security Investigations (HSI) Special Agent (SA) Justin Myers, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I, HSI SA Justin Myers, make this affidavit in support of an application for a search and seizure warrant to collect saliva and/or blood samples for the purpose of Deoxyribonucleic Acid (DNA) testing, to be analyzed by an authorized forensic laboratory, from the body of Kah'Lil Kiree Lamonte WADE, an adult male, date of birth January 21, 1997, as described in Attachment A, to test and compare said substance with potential DNA evidence that may be found by the Columbus, Ohio Division of Police (CPD) Crime Laboratory during the forensic analysis of three firearms found during the execution of a federal search warrant (case # 2:22-MJ-798) executed on his residence on December 20, 2022. The firearms include: a Glock 26 pistol (S/N: AFSF141); a Bushmaster AR-15 (S/N: L246703); and a Hawk Industries Company 12-gauge shotgun (S/N: NZ615251). WADE is prohibited under federal law from possessing firearms or ammunition due to his criminal history. Investigators believe the firearms belong to WADE. The CPD Crime Laboratory requested DNA standards from WADE to compare against any DNA that they recover during their forensic analysis of the firearms.



2. I therefore believe there is probable cause to believe that the items described in Attachment B, contain evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 922 (g)(1) - possession of a firearm or ammunition by a prohibited person. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I did not include each and every fact known concerning this investigation. I did not withhold any information or evidence that would negate probable cause. I set forth only the facts that are believed to be necessary to establish probable cause that evidence, fruits, and instrumentalities of the violation listed above are present within the DNA of WADE, who is or will be located within the Southern District of Ohio.

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3. I gained experience through a bachelor's degree in Criminology, a master's degree in Forensic Science, completion of the Federal Criminal Investigator Training Program (CITP), and completion of the HSI Investigations Academy. During CITP and the HSI Academy training, I was instructed in all phases of criminal investigation such as: Criminal Law, Search and Seizure, Field Enforcement Techniques, Firearms Proficiency, and Interviewing and Evidence. I have also completed the HSI Cyber Undercover Training and Advanced Cryptocurrency and Darknet Training Courses. I am responsible for investigating all violations of U.S. Customs and Immigration laws, including narcotics and firearm investigations, and have participated in numerous investigations involving violations of both. I have received specialized training for both types of investigations.

4. The information set forth in this affidavit is based upon my knowledge, training, experience, and participation in investigations involving the smuggling, possession, distribution, and storage of narcotics and narcotics proceeds. This information is also based on the knowledge, training, experience, and investigations conducted by fellow law enforcement officers, which have reported to me either directly or indirectly. I believe this information to be true and reliable.

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**SEARCH METHODOLOGY TO BE EMPLOYED AND STORAGE**

5. The search procedure for extracting saliva and/or blood samples from the body may

include the following techniques (the following is a non-exclusive list, as other search procedures may be used):

- a. the use of cotton or nylon tipped swabs to collect a saliva sample;
- b. the use of a medical professional to collect a blood sample;
- c. performing any other authorized technique that may be necessary to extract the evidence described in Attachment B;
- d. the property/evidence will be turned over to the Ohio BCI Forensic Laboratory, or any other authorized forensic laboratory, for analysis and any unconsumed swabs will subsequently be retained in the HSI evidence room.

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### **PROBABLE CAUSE FOR SEARCH WARRANT**

6. On October 24, 2022, United States Customs and Border Protection (CBP) selected an international parcel (FedEx # 27909845570) for examination that was inbound into the United States from the country of China. The parcel was scheduled to be delivered to “Kwade” at 4460 Keeler Drive, Columbus, Ohio 43227 (hereafter referred to as: TARGET RESIDENCE). The contents of the parcel were manifested as “SCREW” with a declared value of \$50.00.

7. Upon examination and a physical inventory of the contents of the parcel, CBP determined the contents to contain one pill press die set (upper and lower punch with receiving die). The die set contained markings consisting of a logo of square box with a letter “M” inside of the box and the number “30”. CBP seized the contents pursuant to 19 U.S.C. § 1595a(c)(2)(A), 21 U.S.C. § 863(a)(3), and 21 U.S.C. § 863(d). The evidence was turned over to HSI.

8. State of Ohio databases identified Kah’Lil Kiree Lamonte WADE as current resident of the TARGET RESIDENCE. The seized parcel was scheduled to be delivered to “Kwade” at that residence, which is consistent with the name Kah’Lil Kiree Lamonte WADE.

9. Department of Homeland Security databases list a past international parcel from China scheduled to be delivered to Ashley MCNEIL at the TARGET RESIDENCE. The parcel entered



the United States on February 26, 2022. The parcel was manifested as a "PRESS MACHINE." CBP did not inspect the parcel. The parcel was not seized. CBP released the parcel to United States Mails for delivery to the scheduled recipient. I know that past international parcels seized by CBP manifested as "PRESS MACHINE" have either contained a full pill press or pill press parts. I also know that ordering a pill press or pill press parts and the subsequent pill press die set is consistent with somebody that is currently producing, or attempting to produce, pills.

10. State of Ohio databases list WADE and MCNEIL as residing together at previous addresses, along as at the TARGET RESIDENCE. Investigators determined MCNEIL to be WADE's former girlfriend. They no longer appear to reside together.

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11. WADE is restricted from possessing a firearm due to his criminal convictions. State of Ohio and federal databases list WADE's criminal convictions from 2015-2022 as: theft (Felony 3), possession of a controlled substance (Misdemeanor 1), discharge firearm on/near prohibited premises (Felony 3), attempted burglary (Felony 3), possession of drugs (Misdemeanor 1), and criminal mischief (Misdemeanor 3). WADE currently has an active warrant for burglary. All criminal convictions and the active warrant are associated with the violations of the Ohio Revised Code (ORC).

12. The Drug Enforcement Administration's (DEA) Tactical Diversion Squad (TDS) in Columbus, Ohio identified the markings on the seized pill press die set as markings consistent with a 30mg oxycodone pill made by the company Mallinckrodt Pharmaceuticals. The TDS stated the seized pill press die set appears to be counterfeit and that the markings placed on the die set are slightly different than a legitimate die set. The TDS also stated that WADE nor MCNEIL have reported the importation and operation of a pill press to the DEA as required under 21 U.S.C. § 1310.05.

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13. On December 02, 2022, WADE was arrested at the Hollywood Casino in Columbus on a state felony warrant for receiving stolen property in violation of ORC 2913.51(A). At the time arrest, WADE had a bag on his person containing approximately 46.3 grams of Marijuana

(Schedule I controlled substance) and a bag containing 28 pills. The pills were rectangle in shape and green in color. Each pill contained the marking "S 90 3". That marking is associated with the drug Alprazolam (Xanax). The pills were sent to the Ohio Bureau of Criminal Investigation (BCI) Forensic Laboratory for analysis. The BCI Forensic Laboratory confirmed twenty three (23) pills contained 7.34 grams of 6-(4-chlorophenyl)-1-methyl-4H-[1,2,4]triazolo[4,3-a][1,4]benzodiazepine (4'-chloro Deschloroalprazolam) and five (5) pills contained Bromazolam. Both substances under Ohio Administrative Code 4729:9-1-01(E)(5) are controlled as benzodiazepine pharmacophores, which are Schedule I depressants in the State of Ohio.

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14. On December 05, 2022, I obtained a warrant through the U.S. District Court in the Southern District of Ohio (case # 2:22-MJ-766) to place a Global Positioning Device in/on his gray 2006 BMW X5 bearing State of Ohio plate GIM8325. Electronic surveillance showed the vehicle located at numerous motels/hotels and apartment complexes for short durations. That activity was consistent with the distribution of controlled substances.

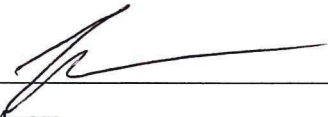
15. On December 20, 2022, HSI Columbus, along with the Drug Enforcement Administration, executed a federal search warrant (case # 2:22-MJ-798) on the TARGET RESIDENCE. WADE was home at the time. WADE was arrested on a state warrant for burglary at the time of the search warrant. I advised WADE of his Miranda Warnings, which he waived in writing. He admitted to receiving a pill press through U.S. Mails but stated that his girlfriend Ashley McNeil was not involved. At that point WADE declined to answer any additional questions. HSI seized the following items from the TARGET RESIDENCE: a Glock 26 9mm pistol (S/N: AFSF141) with a loaded extended magazine and a loaded standard magazine; a Bushmaster AR-15 (S/N: L246703); and a Hawk Industries Company 12-gauge shotgun (S/N: NZ615251); additional rounds of 9mm ammunition, a complete set of ballistic body armor; a full manual pill press; one kilogram of pill binding agent (baby blue for M30 pills); a grinder being used with the pill press to mix powders; numerous doses of Suboxone; and approximately 337 grams of marijuana. The loaded extended magazine was inserted into the Glock 26 pistol. The chamber to the pistol did not contain a round.



16. Based on investigative efforts to date, I believe the firearms found in the TARGET RESIDENCE and subsequently seized during the execution of the search warrant belong to WADE and will contain his DNA. I further believe WADE was using the firearms to protect his unlawful controlled substance pill producing operation.

**CONCLUSION**

17. I respectfully request the attached warrant be issued authorizing the search of any item described in Attachment A, and to seize the items listed in Attachment B, which are located in the Southern District of Ohio, to be analyzed and compared by an authorized forensic laboratory to any DNA evidence collected by the CPD Crime Laboratory during the examination of a Glock 26 pistol (S/N: AFSF141); a Bushmaster AR-15 (S/N: L246703); and a Hawk Industries Company 12-gauge shotgun (S/N: NZ615251) seized during the execution of a federal search warrant (case # 2:22-MJ-798) on the TARGET RESIDENCE and are suspected of belonging to WADE.

  
\_\_\_\_\_  
Justin Myers  
Special Agent  
Homeland Security Investigations

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) on this 22nd day of December 2022.

  
\_\_\_\_\_  
Kimberly A. Johnson  
United States Magistrate Judge



**ATTACHMENT A**

**DESCRIPTION OF LOCATION TO BE SEARCHED**

The body of Kah'Lil Kiree Lamonte Wade, an adult male, date of birth January 21, 1997, which is or will be in the Southern District of Ohio.

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**ATTACHMENT B**

**PARTICULAR THINGS TO BE SEARCHED AND SEIZED**

1. To search for and seize saliva and/or blood samples for the purpose of Deoxyribonucleic Acid (DNA) testing, to be analyzed by an authorized forensic laboratory, that are located in the body of Kah'Lil Kiree Lamonte WADE, an adult male, date of birth January 21, 1997 and compare it to potential DNA evidence that may be found by the Columbus, Ohio Division of Police (CPD) Crime Laboratory during the forensic analysis of three firearms found during the execution of a federal search warrant (case # 2:22-MJ-798) executed on his residence on December 20, 2022. The firearms include: a Glock 26 pistol (S/N: AFSF141); a Bushmaster AR-15 (S/N: L246703); and a Hawk Industries Company 12-gauge shotgun (S/N: NZ615251). WADE is prohibited under federal law from possessing firearms or ammunition due to his criminal history. Possession of firearms or ammunition constitute evidence of, contraband, fruits of crime, or property designed or intended for use or which has been used as the means of committing the criminal offenses of 18 U.S.C. § 922 (g)(1), possession of a firearm or ammunition by a prohibited person. DNA evidence that may potentially be collected from the firearms is suspected of being directly associated with WADE.

2. The CPD Crime Laboratory requested that a Special Agent with Homeland Security Investigations, or their designee, be authorized to collect the following DNA standard from WADE for such comparison:

- a. Collect a saliva sample through the use of cotton or nylon tipped swabs or by any other authorized means;
- b. Collect a blood sample through the use of a medical professional.